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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ADAM TIMOTHY GROOM,	)	Case No.: 2:23-cv-00174-AC
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
	)	FOR AN EXTENSION OF TIME
vs.	)	
KILOLO KIJAKAZI,	)	
Acting Commissioner of Social Security,	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended 30 days from October 5, 2023, up to and including November 6, 2023. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly. This is Defendant's first request for an extension of the Cross-Motion for Summary Judgment deadline.

Good cause for an extension exists. Defendant requires additional time to review the defensibility of this case. An extended deadline would allow Plaintiff time to consider any remand offer and the parties to negotiate the terms of any remand offer. An extension would also provide Defendant adequate time to brief a cross-motion for summary judgment if the

1 parties cannot agree to a voluntary remand. Thus, Defendant respectfully requests an extension  
2 of 30 days, up to and including November 6, 2023, to file the cross-motion for summary  
3 judgment. This request is made in good faith and is not intended to unduly delay the proceedings  
4 in this matter.

5 Respectfully submitted,

6 Dated: September 19, 2023

/s/ Robert Weems\*  
(\*as authorized via e-mail)  
ROBERT WEEMS  
Attorney for Plaintiff

9 Dated: September 19, 2023

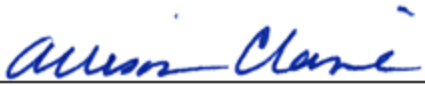
10 PHILLIP A. TALBERT  
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11  
12 By: /s/ Sohayl Vafai  
13 SOHAYL VAFAI  
14 Special Assistant U.S. Attorney  
15 Attorneys for Defendant

16 **ORDER**

17 Pursuant to the parties' stipulation, IT IS ORDERED that Defendant shall have an  
18 extension, up to and including November 6, 2023, to respond to Plaintiff's Motion for Summary  
19 Judgment.  
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21 DATED: September 19, 2023

22   
23 ALLISON CLAIRE  
24 UNITED STATES MAGISTRATE JUDGE  
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26  
27  
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